



UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America

v.

Alexandru RADULESCU

Case No.

Case: 2:24-mj-30248

Assigned To : Unassigned

Assign. Date : 7/1/2024

Description: COMP USA V.

RADULESCU (KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 25, 2024 in the county of St. Clair in the
Eastern District of Michigan, the defendant(s) violated:

*Code Section**Offense Description*

Title 8, United States Code, Section 1324(a)(1)(A)
(ii)

Transporting Illegal Aliens

This criminal complaint is based on these facts:

On or about June 25, 2024, in the Eastern District of Michigan, Southern Division, Alexandru RADULESCU, a Canadian citizen, did knowingly or in reckless disregard of the fact that an alien(s) had come to, entered, or remained in the United States in violation of law, transport or move such alien(s) within the United States by means of transportation or otherwise, in furtherance of violation of Title 8, United States Code, Section 1324(a)(1)(A)(ii).

☒ Continued on the attached sheet.


Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: July 1, 2024

City and state: Detroit, Michigan


Complainant's signature

Sarah A. Soles, Border Patrol Agent
Printed name and title


Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge
Printed name and title

AFFIDAVIT


I, Sarah A. Soles, declare the following under penalty of perjury:

1. I, Sarah A. Soles, am a Border Patrol Agent (BPA) with the United States Border Patrol and have been since June 22, 2009. As a U.S. Border Patrol Agent, I am tasked with detecting, preventing, and apprehending undocumented aliens, smugglers of aliens, and illegal narcotics by maintaining surveillance and/or patrolling the international border with the United States and Canada.
2. I make this affidavit in support of a finding of probable cause that, on June 25, 2024, Defendant Alexandru RADULESCU, committed violations of Title 8 U.S.C. § 1324(a)(1)(A)(ii) (relating to knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by means of transportation or otherwise, in furtherance of such violation of law). This affidavit is based upon my personal knowledge, information provided by other law enforcement officers, and record checks of law enforcement and Department of Homeland Security databases. This affidavit may not contain all the information gathered during the investigation of this incident.
3. On or about June 25, 2024, Border Patrol Agent Alan Merle from the Marysville Border Patrol Station was conducting surveillance in the Diamond Cove Marina located in a private residential neighborhood on the St. Clair River in East China, Michigan. The St. Clair River serves as the international boundary between the United States and Canada. Due to several alien smuggling events in the area involving a Canadian registered vessel (ON59E53675), agents have been conducting plain clothes surveillance in unmarked vehicles in several known smuggling locations.
4. At approximately 5:25 p.m., Agent Merle observed a silver Dodge Ram enter the parking area near the boat slips in Diamond Cove. The agent noticed the truck had Ontario license plates (BY72699) and ran records checks on the vehicle. Records indicated that the truck had entered the inspection lanes at the Bluewater Bridge Port of Entry in Port Huron, Michigan about thirty minutes before entering the lot with one occupant, Alexandru RADULESCU, a Romanian born, Canadian citizen. Soon after the truck entered the lot, Agent Merle observed a vessel matching the

description of the one used in recent smuggling events. Agent Merle confirmed that the boat registration was ON59E53675 and notified other agents in the area that the boat, with four people onboard was entering Diamond Cove from the St. Clair River. The boat approached a dock and three individuals climbed out and entered the Dodge Ram waiting in the parking area. The Dodge Ram exited Diamond Cove and turned northbound towards the city of St. Clair.


5. After having witnessed the Canadian vessel make entry into the United States and drop the three passengers in the vehicle off, Agent Merle initiated a traffic stop on the Dodge Ram as it entered the city of St. Clair. Agent Merle identified himself as a U.S. Border Patrol Agent and had the driver, RADULESCU, exit the truck. RADULESCU was detained and Agent Merle began to question the passengers as to their citizenship. All three passengers stated they were citizens of Romania and readily admitted to entering the United States illegally by boat from Canada. Several other agents arrived to assist Agent Merle in placing all subjects under arrest and transporting them to the Marysville Border Patrol Station for further investigation and processing.
6. At the Marysville Border Patrol Station, all subjects were fingerprinted. Records checks revealed that all three Romanian citizens, identified as Cristian Mihail ENE, Daniel Petrisor FLORESCU and Georgiana NEGOITA, had been previously ordered removed from the United States by immigration judges. All three Romanians were advised of their rights per form I-214 and all subjects verbally stated and indicated with their signatures that they understood their rights and waived their right to have an attorney present during questioning.
7. During individual interviews, ENE, FLORESCU and NEGOITA all stated that they had traveled from Romania to Toronto, Ontario with the intention to find a way to enter the United States to live and work.
8. RADULESCU was advised of his Miranda rights per form I-214 and he verbally and with his signature confirmed that he understands his rights. RADULESCU invoked his right to remain silent and requested that he speak with a lawyer before answering any questions related to his arrest.

9. Based on the above information, I believe there is probable cause that Alexandru RADULESCU, a Canadian Citizen, knowingly or in reckless disregard of the fact that an alien(s) has come to, entered, or remains in the United States in violation of law, transported, or moved or attempted to transport or move such alien(s) within the United States by means of transportation or otherwise, in furtherance of such violation of law on June 25, 2024, at or near East China, Michigan, in violation of 8 U.S.C. §1324(a)(1)(A)(ii).



Sarah A. Soles, Border Patrol Agent
U.S. Department of Homeland Security

Subscribed and sworn to before me in my
presence and/or by reliable electronic means.



Hon. Anthony P. Patti
United States Magistrate Judge
July 1, 2024